

IN THE DISTRICT/SUPERIOR COURT FOR THE STATE OF ALASKA
AT ANCHORAGE

JANE DOE

Plaintiff(s),

vs.

JUSTIN SCOTT SCHNEIDER

Defendant(s).

CASE NO. 3AN-18-10422 CI

**SUMMONS
AND
NOTICE TO BOTH PARTIES
OF JUDICIAL ASSIGNMENT**

To Defendant: JUSTIN SCOTT SCHNEIDER

You are hereby summoned and required to file with the court a written answer to the complaint which accompanies this summons. Your answer must be filed with the court at (address): 825 WEST 4TH STREET, ANCHORAGE, AK 99501 within 20 days* after the day you receive this summons.

In addition, a copy of your answer must be sent to:

Plaintiff's attorney or plaintiff (if unrepresented): James J. Davis, Jr.

Address: Northern Justice Project, LLC, 310 K Street, Suite 200, Anchorage, AK 99501

If you fail to file your answer within the required time, a default judgment may be entered against you for the relief demanded in the complaint.

If you are not represented by an attorney, you must inform the court and all other parties in this case, in writing, of your current mailing address and any future changes to your mailing address and telephone number. You may use court form *Notice of Change of Address / Telephone Number* (TF-955), available at the clerk's office or on the court system's website at www.state.ak.us/courts/forms.htm, to inform the court.

-OR-

If you have an attorney, the attorney must comply with Alaska R. Civ. P. 5(i).

NOTICE OF JUDICIAL ASSIGNMENT

To: Plaintiff and Defendant

You are hereby given notice that this case has been assigned to Judge Guidi.



11/13/18
Date

CLERK OF COURT

By: O. Blanchard
Deputy Clerk

James J. Davis, Jr., AK Bar No. 9412140
Goriune Dudukgian, AK Bar No. 0506051
NORTHERN JUSTICE PROJECT, LLC
310 K Street, Suite 200
Anchorage, AK 99501
(907) 264-6634 (telephone)
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Attorneys for Plaintiff

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

JANE DOE)
)
 Plaintiff,)
)
 vs.)
)
 JUSTIN SCOTT SCHNEIDER)
)
 Defendant)
)
 _____) Case No.

COMPLAINT FOR ACTUAL, COMPENSATORY AND PUNITIVE DAMAGES

COMES NOW plaintiff, by and through the Northern Justice Project, LLC and as her complaint against Justin Scott Schneider, states and alleges as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction in this action under AS § 22.10.020(c) and (g).
2. Venue is proper in Anchorage under AS § 22.10.030 and Civil Rule 3(c).

PARTIES

3. Plaintiff is a resident of Anchorage.
4. Defendant is a resident of Anchorage.

FACTS

5. Jane Doe is a 26 year old Native Alaskan woman.

6. On August 8, 2017, Jane Doe was at a gas station in Anchorage at Spenard Road and Minnesota Avenue. A Caucasian man in a white SUV pulled up to her and started speaking with her. The man identified himself as "Dan." This was a lie: the man was, in fact, Justin Scott Schneider. The man further lied and told Jane Doe that he was her friend, and that she simply did not remember him. The man said that he would be happy to give her a ride across town. Jane Doe accepted Schneider's offer.

7. After Jane Doe got into Schneider's SUV, Schneider told her that he needed to drive to another vehicle to retrieve something. This was also a lie. Schneider drove to the area of 36th and Wisconsin Streets. Schneider asked Jane Doe to get out of the SUV to assist in the loading of the vehicle. Jane Doe got out of the vehicle. It was at that point that Schneider attacked Jane Doe. He tackled her to the ground and began strangling her with his hands. Schneider was much bigger and stronger than Jane Doe; he is 6'4" and at least 200 pounds. Schneider was straddling Jane Doe. Schneider told Jane Doe that he was going to kill her. Schneider strangled her into unconsciousness.

8. When Jane Doe awoke, Schneider was standing up with his penis

out of his pants. Schneider told Jane Doe that he had not intended to, in fact, kill her but that he, instead, had a sick, sexual perversion: he needed to threaten a woman with death in order to be sexually fulfilled and in order to ejaculate. Jane Doe discovered that her face and hair were covered with Schneider's ejaculate.

9. Schneider left Jane Doe and went back home to his wife and children or to his federal government job. Jane Doe called the police and reported that she had been kidnapped, almost strangled to death, and sexually assaulted. She gave the police Schneider's license plate number.

10. The police investigated and concluded that Jane Doe was telling the truth about all of these facts.

11. Jane Doe did everything she could to cooperate with the police and with the Office of the Attorney General. She provided multiple telephone numbers and an email address. Jane Doe was asked to and did appear before the grand jury. Jane Doe was willing and able to go to any and all court hearings to see that justice was done in her case and, in fact, testified against his pretrial release at his bail hearing on grounds that she feared for her safety.

12. Schneider was indicted for felony kidnapping and assault.

13. Astonishingly, Schneider never spent a day in jail. Instead, because he is well-off, and because his parents hold well thought-of religious positions in the community, he obtained bail and was released to the "custody" of his parents. He was placed on "home arrest" which, in the case of Schneider, meant that he could stay at his parent's home in Homer and effectively be on vacation and do

whatever he wanted to do. The Office of the Attorney General made this decision without any input from Jane Doe.

14. At some unknown point in time, the Office of the Attorney General decided that it should radically reduce the charges that had been filed against Schneider. It therefore, decided, without any input or approval from Jane Doe, to reduce the felony charges against Schneider to misdemeanors.

15. The Office of the Attorney General states that it radically reduced the charges against Schneider this because Jane Doe was unreachable and was unavailable to be a witness. This is false: Jane Doe is—and was always—reachable, and she is—and always was—willing to be a witness.

16. Jane Doe believes that the Office of the Attorney General reduced the charges against Schneider because he was a well-do to Caucasian man with ample resources and powerful connections, whereas she was a young, low-income Native woman.

17. Jane Doe does not believe that she is the first woman that Schneider assaulted. Jane Doe contends that that notion is preposterous. Instead, Jane Doe believes that Schneider has assaulted many women before assaulting her. That is, Schneider is a serial sexual predator. Despite this obvious commonsense conclusion, the Office of the Attorney General decided that reducing Schneider's felony charges to misdemeanors made the most sense.

18. But that was not the worst. The worst was that the Office of the Attorney General thereafter decided to enter a plea agreement with Schneider

whereby he would plead guilty and do no jail time at all. Instead, he was given “one free pass,” as the Office of the Attorney General explained.

19. Jane Doe does not believe that a man who engages in attempted murder, kidnapping, and a violent sexual assault should ever get a “free pass.” Jane Doe does not believe that a Native man (or other man of color) who committed similar crimes against a Caucasian woman would ever get “one free pass.” This plea deal was so outrageous that the presiding judge, Judge Michael Corey, said that it would take the public’s breath away if they ever learned of it.

20. On September 19, 2018, Schneider pled guilty to assault in the second degree for his actions towards Jane Doe.

21. Jane Doe was injured by Schneider, physically and emotionally.

FIRST CAUSE OF ACTION – ASSAULT AND BATTERY

22. The foregoing paragraphs of this Complaint are incorporated herein as though fully set forth.

23. Schneider’s actions were wanton, willful, and were designed to humiliate, disgrace and hurt Jane Doe.

24. Schneider’s actions caused Jane Doe physical and emotional injuries. Jane Doe is entitled to actual, compensatory and punitive damages.

SECOND CAUSE OF ACTION – NEGLIGENCE

25. The foregoing paragraphs of this Complaint are incorporated herein as though fully set forth.

26. Schneider should have known that if he assaulted or battered or falsely imprisoned Jane Doe, it would cause her severe physical and emotional distress.

27. As a direct and proximate result of Schneider's negligent actions. Jane Doe has suffered severe physical and emotional injuries.

28. Jane Doe is entitled to actual, compensatory, and punitive damages.

THIRD CAUSE OF ACTION – INTENTIONAL AND NEGLIGENT INFILCITION OF EMOTIOMNAL DISTRESS

29. The foregoing paragraphs of this Complaint are incorporated herein as though fully set forth.

30. Schneider, with his extreme and outrageous conduct, intentionally or recklessly caused serve physical injury and emotional distress to Jane Doe.

FOURTH CAUSE OF ACTION – AS 09.60.070

31. The foregoing paragraphs of this Complaint are incorporated herein as though fully set forth.

32. Jane Doe's injuries resulted from the commission of serious criminal offenses by Schneider.

33. Jane Doe is therefore entitled to an award of her full reasonable attorney's fees in accord with AAS 09.60.070.

PRAYER FOR RELIEF

WHEREFORE, plaintiff respectfully requests that the Court award:

(1) Actual, compensatory, and punitive damages against the defendant;

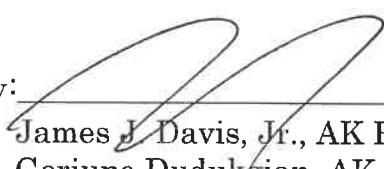
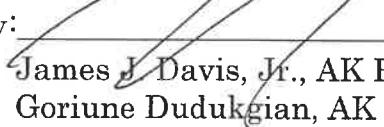
(2) The costs and expenses of litigation, including full reasonable attorney fees; and

(3) All other relief as the Court deems necessary.

DATED this 13 day of November, 2018

NORTHERN JUSTICE PROJECT, LLC
Attorneys for Plaintiff

By:


James J. Davis, Jr., AK Bar No. 9412140

Goriune Dudukgian, AK Bar No. 0506051